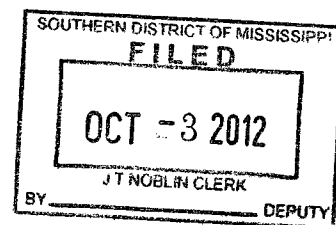


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:12cr117 TSL-FKB

GEORGE HILLIARD,
ZACK ROBINSON,
KENT DANIELS,
and WATSON LEE JACKSON, JR.

18 U.S.C. 371
18 U.S.C. 641

The Grand Jury Charges:

At all times relevant to this indictment:

The defendant, **ZACK ROBINSON**, was a law enforcement officer with the Hinds County Mississippi Sheriff's Office.

The defendant, **WATSON LEE JACKSON, JR.**, was a law enforcement officer with the Madison County Mississippi Sheriff's Office.

COUNT 1

Beginning on or about September 6, 2011, and continuing through on or about November 27, 2011, in Hinds County in the Jackson Division of the Southern District of Mississippi, and elsewhere, the defendants, **GEORGE HILLIARD, ZACK ROBINSON, KENT DANIELS, and WATSON LEE JACKSON, JR.**, did knowingly and willfully conspire, confederate, and agree together with each other, to commit the following offense against the United States, to wit:

Theft of Government Property in violation of Section 641, Title 18, United States Code.

It was a part of the conspiracy that the defendants would discuss stealing cash from drug dealers traveling to Mississippi from other states.

Overt Acts

In furtherance of the conspiracy and to carry out its objectives, the following overt acts, among others, were committed:

1. On or about September 14, 2011, the defendants **ROBINSON** and **DANIELS** met and discussed details on how to commit a robbery of drug dealers traveling to Mississippi from other states.

2. On or about September 30, 2011, the defendants **ROBINSON, DANIELS, and JACKSON** drove to a hotel room in Jackson, Mississippi to steal personal property from whom they believed to be drug dealers traveling to Mississippi from other states.

3. On or about September 30, 2011, the defendant, **ROBINSON** entered a hotel room in Jackson, Mississippi and took a bag containing approximately \$23,000.00 in United States Currency;

4. On or about September 30, 2011, the defendant, **JACKSON** entered a hotel room in Jackson, Mississippi looking for United States Currency.

All in violation of Section 371, Title 18, United States Code.

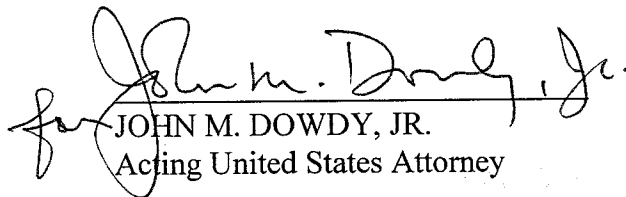
COUNT 2

That on or about September 30, 2011, in Hinds County in the Jackson Division of the Southern District of Mississippi, the defendants, **GEORGE HILLIARD, ZACK ROBINSON, KENT DANIELS, and WATSON LEE JACKSON, JR.**, aided and abetted by each other, and others known and unknown to the Grand Jury, did steal, purloin and knowingly convert to their own use approximately \$23,000.00 in United States Currency and seven (7) ipads belonging to the United States of America, in violation of Sections 641 and 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

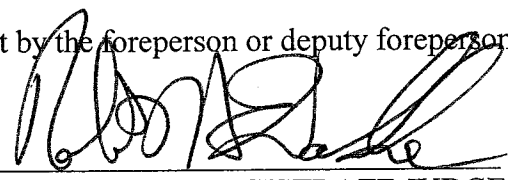
As a result of committing the offenses as alleged in this Indictment, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this count or any bill of particulars supporting it.

All pursuant to Section 981(a)(1)(c), Title 18, United States Code, and Section 2461, Title 28, United States Code.


JOHN M. DOWDY, JR.
Acting United States Attorney

A TRUE BILL:
S/SIGNATURE REDACTED
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 3rd day of October, 2012.


UNITED STATES MAGISTRATE JUDGE